

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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JOAQUIM AMBROZIO & MARIA AMBROZIO, his :	
wife, :	
Plaintiffs, :	Case No. 16-CV-07561 (ES)(JAD)
v. :	
TAP AIR PORTUGAL, :	STIPULATION AND
Defendant. :	PROPOSED ORDER
-----X	EXTENDING TIME
	TO RESPOND TO
	<u>COMPLAINT</u>

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for Plaintiffs and Defendant TRANSPORTES AEREOS PORTUGUESES, S.A. (sued herein as "TAP AIR PORTUGAL" and hereinafter "TAP"), that the time within which TAP may move, answer or otherwise respond to the Complaint is hereby extended up to and including June 9, 2017.

Good cause exists for this Stipulation and Proposed Order. The parties have conferred through their counsel and believe that this extension will provide an opportunity to explore the potential for an early settlement in this matter without the need to move forward with this litigation.

No provision in this Stipulation and Proposed Order shall be construed as a waiver of, and TAP expressly reserves, any and all claims and defenses in this matter.

There has been one previous request for an extension of time in connection with this matter.

Dated: May 5, 2017

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Attorneys for Defendant
TRANSPORTES AEREOS PORTUGUESES,
S.A.

SO ORDERED:


Honorable Joseph A. Dickson
United States Magistrate Judge

Dated: May 5th, 2017